UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 21 2000

Monica Conyngham
Foley, Hoag & Eliot
One Post Office Square
Boston, Massachusetts 02109-2170

Michael P. Last, Esquire
Mintz, Levin, Cohn, Feris, Glovsky and Popeo, P.C.
One Financial Center
Boston, Massachusetts 02111

Robert Sanoff, Esquire
Foley, Hoag & Eliot
One Post Office Square
Boston, Massachusetts 02109-2170

Re: Cornell-Dubilier Electronics Superfund site
South Plainfield, Middlesex County, New Jersey

Dear Sirs/Madam:

This letter is in response to your "Proposed Scope of Work for Remediation Planning" at the Cornell-Dubilier Electronics Superfund site, located in South Plainfield, New Jersey. This scope of work, dated October 3, 2000, outlines a proposal by Dana Corporation and Cornell-Dubilier Electronics, Inc., (CDE) for completing a portion of the Remedial Investigation/Feasibility Study (RI/FS). Specifically, the potentially responsible parties (PRPs) offered to complete the RI/FS for the Hamilton Industrial Park property - the former Dana and CDE plant site - in order to facilitate and expedite the redevelopment of that portion of the site.

In July 1998, the U.S. Environmental Protection Agency (EPA) gave all PRPs, including Dana Corporation and CDE, an opportunity to perform the RI/FS for the site. Both Dana Corporation and CDE, as well as the other PRPs, declined to perform the RI/FS, as defined in EPA's statement of work. At that time, the PRPs were unwilling to perform a comprehensive site investigation, and EPA elected to perform the RI/FS using EPA resources.

EPA's RI has focused on four areas of concern: the Hamilton Industrial Park; neighboring residential properties; sediment contamination in the Bound Brook originating from the site; and site-related groundwater contamination. As you are aware, EPA began the RI/FS for the site in April 2000 and has recently completed the Phase I field activities, as defined in the RI/FS

work plan, dated March 2000. The Phase I field activities initiated investigations at all four of the areas of concern identified above. EPA is currently waiting for the Data Evaluation Report to determine what additional field sampling activities are necessary to complete the RI/FS.

After careful consideration of your proposal, as summarized in your October 3, 2000 briefing package (enclosed for reference), we must decline your offer for at least two reasons. First, your offer still only proposes to address one portion of the site. Second, in light of EPA's current schedule for completing the RI/FS, we do not see a substantial schedule advantage to your offer to perform work.

Nevertheless, as we stated during our meeting on October 5, 2000, EPA is committed to the Redeveloping Superfund Sites Initiative, and we believe that the conceptual redevelopment plans that you have prepared may provide an opportunity to enhance the beneficial use of the site. In addition, preliminary indications of the RI Phase I field investigations may support EPA taking a phased approach to addressing the site that would also support the redevelopment plans you have initiated. That phased approach would involve addressing the on-site buildings, source areas (i.e., dumping areas and soils that may be considered "Principal Threat Waste" material) and Hamilton Industrial Park soils as a first operable unit, while investigations of other areas continue. Completing an expedited RI/FS for that part of the site would address the worst problems first and may also be consistent with the redevelopment of the Hamilton Industrial Park. EPA agrees that the proposed reuse and redevelopment plans for the site could be integrated into a risk assessment and focused feasibility study tailored for the on-site buildings, source areas, and soils. This approach would support the redevelopment activities to be initiated by the PRPs, pursuant to the schedule outlined in the briefing package, while EPA continues to perform the RI/FS for the remaining portions of the site.

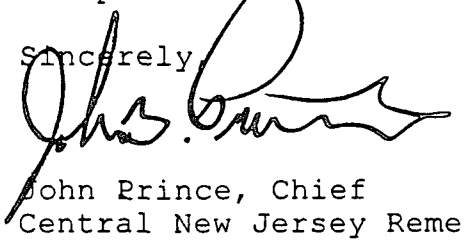
While EPA will still take the primary role in completing the RI/FS, the PRPs would need to take the lead in pursuing the redevelopment of the property and in providing input to the development of remedial alternatives for the site that are protective of human health and the environment and also consistent with subsequent redevelopment plans. In addition, EPA may approach the PRPs to perform select tasks in order to expedite the schedule. If your clients are interested in participating in this way, we can have further discussions on defining this role.

The above-described Phase I sampling results are currently being validated and submitted to EPA in advance of the Data Evaluation Report. Because expediting the Hamilton Industrial Park portion of the site is dependent upon the completeness of this Phase I data, EPA will forward you this data as we receive it, so that you may be reviewing it at the same time.

Finally, EPA strongly believes that the current property owner must play an active role in this process. EPA is transmitting a letter to D.S.C. of Newark Enterprises, Inc., regarding this matter.

Please inform me if this approach is satisfactory to your clients, so that we can implement the necessary measures to begin the above-referenced work. If you have any comments or questions regarding this letter, please call Muthu Sundram, Assistant Regional Counsel, at 212-637-3148, and he can make arrangements to speak with me or Pietro Mannino, the Remedial Project Manager.

Sincerely,



John Prince, Chief
Central New Jersey Remediation Section

Enclosure

HAMILTON INDUSTRIAL PARK REDEVELOPMENT PROJECT
South Plainfield, New Jersey

Proposed Scope of Work for Remediation Planning

Proposal Basis and Overview

As previously discussed with USEPA, the Hamilton Industrial Park PRP Group (HIPG) has made significant progress in initiating a Superfund Redevelopment Initiative (SRI) project at the Hamilton Industrial Park located in South Plainfield, New Jersey. Based on discussions with Borough of South Plainfield officials, local real estate planners and commercial developers, the HIPG believes that the Hamilton Industrial Park site is a viable location for significantly upgraded mixed retail and commercial use which would serve to complement and enhance the neighboring downtown business district. The current conceptual redevelopment plan is provided on the attached figure.

Given the valuable public comment received during two public meetings held by the Borough Council of South Plainfield, and the subsequent unanimous vote of support by the Borough Council for the concept of redevelopment of the Hamilton Industrial Park site, the HIPG is actively assessing options to accelerate the environmental investigation and remediation planning activities currently being implemented by USEPA in order to initiate the redevelopment of this site in a timely manner. To that end, the HIPG has developed this scope of work for completing the remaining portions of the RI/FS for the Hamilton Industrial Park site so as to facilitate and expedite this SRI project.

Specifically, HIPG's efforts in completing the RI/FS as part of the overall redevelopment planning effort will be to integrate the risk assessment and remediation planning with the proposed reuse of the site for retail and commercial uses. In particular, the risk assessment and remediation planning will focus on the remedial requirements for on-site soils and "source materials" (i.e., those materials that may be acting as a continuing source to observed ground water, sediment and/or soil contamination, including any "hot-spot" sediment areas in the on-site portion of the stream).

Taking into consideration (1) the scope of work defined for on-site soils in the March 2000 *Final Work Plan for Remedial Investigation/Feasibility Study, Cornell-Dubilier Electronics Superfund*

Site, South Plainfield, New Jersey, and (2) what would constitute an efficient point to transition the project for SRI purposes, HIPG's proposed scope of work includes the following tasks:

Task 1 – Remedial Investigation
1. Preliminary Data Assessment
2. Phase II Data Collection

Task 2 – Remediation Planning
1. Risk Assessment
2. Remediation Planning

Given USEPA's RI/FS Work Plan schedule, it is anticipated that these project tasks can commence upon receipt of USEPA's Phase I validated data. Based on discussions with USEPA on August 23, 2000, the HIPG understands that the Phase I field work was to be completed in mid-September 2000. According to USEPA's RI/FS Work Plan schedule, if sampling was completed by mid-September, then the validated data should be available by mid-November 2000. HIPG anticipates that following receipt of the validated Phase I data, the scope of work outlined below can be completed in approximately 6 to 8 months.

TASK 1 – REMEDIAL INVESTIGATION

Task 1.1: Preliminary Data Assessment

This task includes compilation and evaluation of existing data and USEPA's Phase I RI data to determine if additional sampling will be necessary in order to perform a site-specific risk assessment and to complete remediation planning as part of the redevelopment project. This task will include the following work:

a. Compiling and mapping USEPA's Phase I RI soil, sediment and ground water data, and comparing these data with existing data previously compiled for the site;
b. Conducting a preliminary risk-based screening to identify potential hot-spots and data gaps;
c. Assessing the ground water data relative to risk-based screening levels and available regional data to identify any potential concerns with respect to remediation requirements and/or redevelopment plans for the site;
d. Identifying any further site characterization needs (environmental and/or geotechnical) to fill data gaps and/or delineate contaminant hot-spots; and

e. Participating in a technical meeting(s) with USEPA to discuss the preliminary data assessment and proposed Phase II sampling.

To complete this task efficiently, HIPG will request that USEPA's data be made available in an accessible electronic format.

Task 1.2: Phase II Data Collection

Based on the findings of the preliminary data assessment conducted under Task 1, any necessary Phase II sampling will be implemented to collect certain critical data necessary to (1) perform a site-specific risk assessment, and (2) conduct remediation planning. The Phase II data will be validated prior to use for risk assessment and remediation planning purposes.

For planning purposes, it is assumed that the existing RI plans (e.g., HASP, QAPP, PMP, CRP) will be utilized with only minor modifications, and that only a Phase II sampling and analysis plan will need to be prepared.

TASK 2 – REMEDIATION PLANNING

Task 2.1: Risk Assessement

On completion of Task 1, a site-specific risk assessment will be conducted to support a focused feasibility study for the site. This risk assessment will be prepared in the context of the SRI project, and will include the following work:

a. Conducting a site-specific human health risk assessment for on-site soil concentrations under current (baseline) conditions and planned post-redevelopment conditions. The risk assessment will include an evaluation of potential risks to on-site and off-site receptors associated with existing contamination in on-site soils, and an assessment of the potential for the on-site soils to act as source of contamination to ground water and sediments.
b. Identifying any hot-spots that will need to be addressed as part of the remediation/redevelopment plan in order to achieve acceptable post-redevelopment risk levels.

Task 2.2: Remediation Planning

As Task 2.1 progresses, the remediation requirements associated with the redevelopment plans will be evaluated by performing a focused feasibility study (FFS), taking into consideration

potential risks associated with proposed future land uses. This task may include the following work:

a. Compiling a list of appropriate remedial technologies to undergo screening. A range of alternatives consistent with the redevelopment plans will be compiled, including,

   - No action;
   - Hot-spot and/or buried equipment removal;
   - Installation of engineering controls (e.g., buildings, paving and/or soil caps consistent with redevelopment plans);
   - Consolidation of soils, sediments and/or demolition debris within the area to be covered by soils, pavement and/or buildings; and
   - Stabilization controls to be implemented pending further work (e.g., the on-site stream and wetlands areas).

b. These alternatives will be developed to address contaminated media remaining at the site. At this time, PCBs are considered to be a principal contaminant of concern in site soils and sediments. Should VOCs also be identified as contaminants of concern, additional remedial alternatives would also to be considered. In addition, the scope of possible ground water monitoring/containment systems may need to be considered as they may impact the proposed building and paving plans.

c. Evaluating the screened remedial alternatives in terms of the following nine criteria: short-term effectiveness, long-term effectiveness; reduction of toxicity, mobility or volume; implementability; cost; compliance with ARARs; overall protection of human health and the environment; state acceptance; and community acceptance. Following the individual evaluation of each alternative relative to the nine criteria, a comparative analysis between alternatives will be performed.

d. Preparing a FFS Report which provides documentation of the initial remedial alternative screening analysis and the detailed evaluation of the alternatives. It will identify any necessary changes in the redevelopment plan necessary to address potentially unacceptable risks.

e. Presenting the risk-based evaluation for the final redevelopment plan to the community and USEPA.

Based on its planning consultant's work conducted to date, the HIPG expects that the Hamilton Industrial Park site will be sufficiently attractive to potential developers that the redevelopment activities can be initiated following USEPA's approval of the FFS Report.

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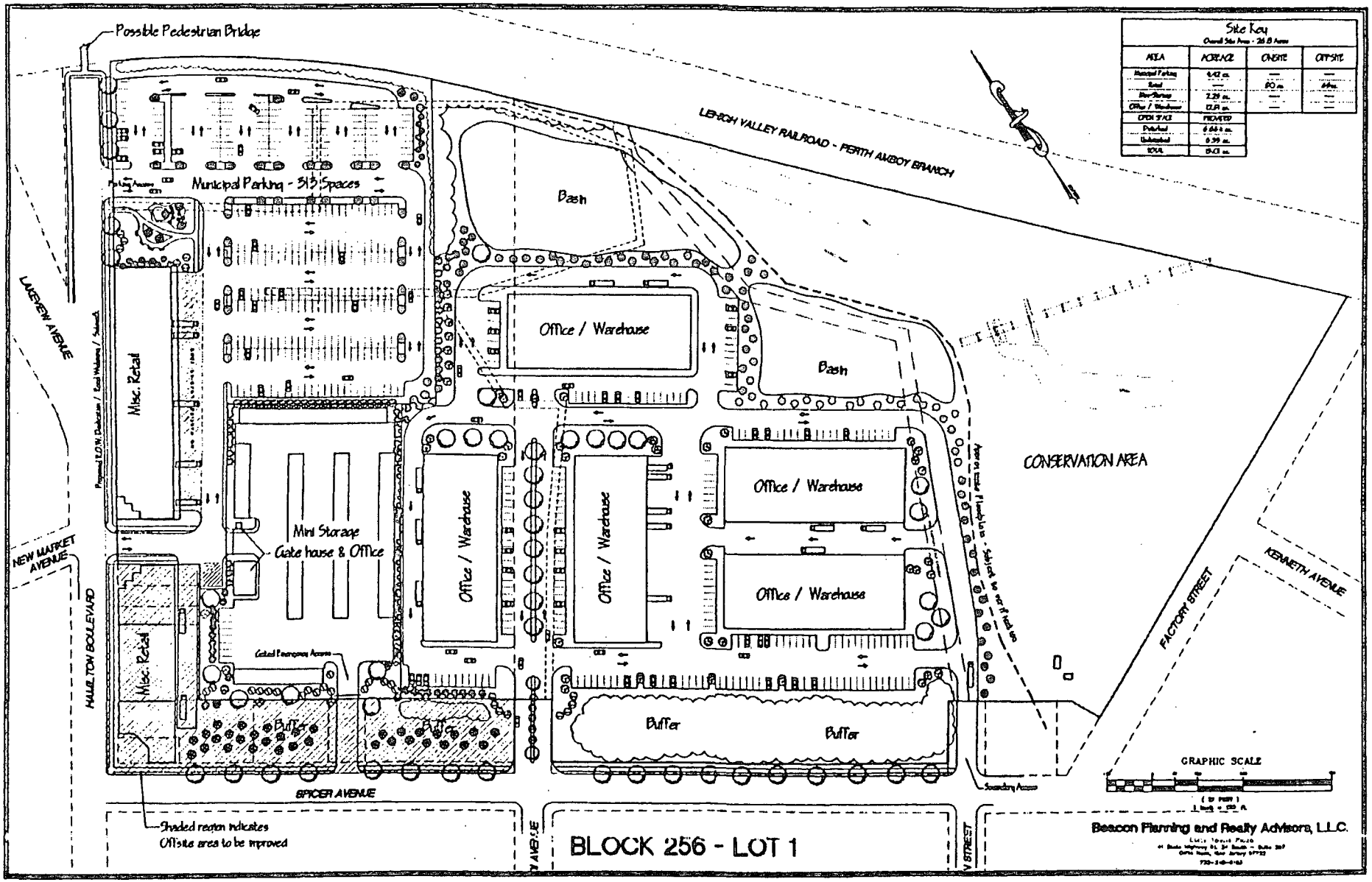


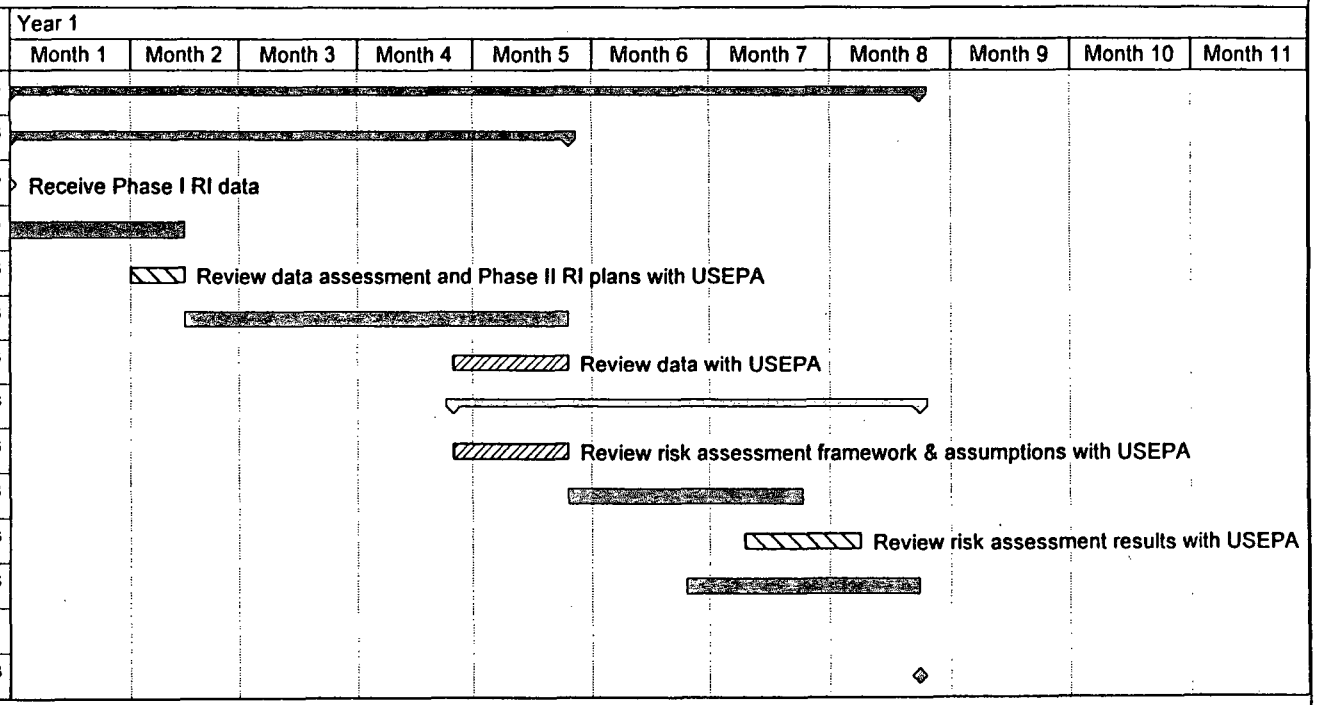
Site Key			
AREA	ACREAGE	ONSITE	OFFSITE

302322

HAMILTON INDUSTRIAL PARK
SUPERFUND REDEVELOPMENT INITIATIVE PROJECT

Proposed Schedule for Remediation Planning

Task Name	Duration
HAMILTON INDUSTRIAL PARK SRI PROJECT	235 days
TASK 1 - REMEDIAL INVESTIGATION	145 days
	0 days
1.1 Preliminary Data Assessment	45 days
	14 days
1.2 Phase II Data Collection & Analysis	100 days
	30 days
TASK 2 - REMEDIATION PLANNING	120 days
	30 days
2.1 Risk Assessment	60 days
	30 days
2.2 Remediation Planning	60 days
SUBMIT FOCUSED FEASIBILITY STUDY	0 days



Project: 02-5840F2
Date: 10/04/00

Task Milestone Summary

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